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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
 ADDICTION/PERSONAL INJURY
 PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

*B.A., individually and as next of friend to
 minor J.A. v. Meta Platforms, Inc., et al.,
 4:23-cv-05055*

*C.C., individually and as next of friend to
 minor M.C. v. Meta Platforms, Inc., et al.,
 2023-cv-06277*

*S.F., individually and as next of friend to
 minor D.F. v. Meta Platforms, Inc., et al.,
 4:23-cv-06287*

*C.R., individually and as next of friend to
 minor S.G. v. Meta Platforms, Inc., et al.,
 4:23-cv-06301*

*V.K., individually and as next of friend to
 minor A.K. v. Meta Platforms, Inc., et al.,
 4:23-cv-05093*

**PLAINTIFFS' SEVENTH CONSOLIDATED
 EX PARTE APPLICATION FOR
 APPOINTMENT OF GUARDIANS AD LITEM**

APPLICATION

Pursuant to this Court’s Order Regarding Appointment of Guardian *Ad Litem* (“Guardians *Ad Litem* Order”) (ECF No. 122 at 3), Plaintiffs’ Liaison Counsel, Jennie Lee Anderson, hereby submits Plaintiffs’ Seventh Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* (“*Ex Parte* Application”) for this Court’s consideration.

“Fit parents are presumed to act in the best interests of their children.” *J.B. by & Through Billiet v. Tuolumne Cnty. Superintendent of Sch.*, No. 19-cv-0858-NONE-EPG, 2021 WL 3115195, at *2 (E.D. Cal. July 22, 2021) (citing *Troxel v. Granville*, 530 U.S. 57, 66 (2000); *Doe v. Heck*, 327 F.3d 492, 521 (7th Cir. 2003)); *see also Brown v. Alexander*, No. 13-cv-01451-RS, 2015 WL 7350183, at *1 (N.D. Cal. Nov. 20, 2015) (“In general, a parent who is also a party to the lawsuit is presumed to be a suitable guardian ad litem, and so the court often appoints the parent as guardian ad litem upon receipt of an ex parte application without exercising much discretion.”) (citation omitted). Absent a conflict of interest, “[a] parent is generally appointed guardian *ad litem*.” *A.G. v. South Bay Dreams Coop., Inc.*, No. 16-cv-02598-RNB, 2018 WL 2002370, at *3 (S.D. Cal. Apr. 30, 2018) (citing *Anthem Life Ins. Co. v. Olguin*, No. 06-cv-01165-AWI NEW (TAG), 2007 WL 1390672, at *3 (E.D. Cal. May 9, 2007)); *accord J.M. v. Liberty Union High Sch. Dist.*, No. 16-cv-05225-LB, 2016 WL 4942999, at *2 (N.D. Cal. Sept. 16, 2016). However, “[w]hen there is a potential conflict between a perceived parental responsibility and an obligation to assist the court in achieving a just and speedy determination of the action, a court has the right to select a guardian ad litem who is not a parent if that guardian would best protect the child’s interests.” *J.M.*, 2016 WL 4942999, at *1 (citations omitted) (internal quotation marks omitted).

Attached as Exhibits 1-5 to the Declaration of Jennie Lee Anderson in Support of Plaintiffs’ Seventh Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* (“Anderson Decl.” or “Anderson Declaration”) are the *Ex Parte* Applications for Appointment of Guardians *Ad Litem* (“Applications”) submitted by the parents and/or legal guardians of individual minor Plaintiffs in the following cases:

- *B.A., individually and as next of friend to minor J.A. v. Meta Platforms, Inc., et al.*, 4:23-

- 1 cv-05055 (Exhibit 1);
- 2 • *C.C., individually and as next of friend to minor M.C. v. Meta Platforms, Inc., et al.*,
- 3 2023-cv-06277 (Exhibit 2);
- 4 • *S.F., individually and as next of friend to minor D.F. v. Meta Platforms, Inc., et al.*, 4:23-
- 5 cv-06287 (Exhibit 3);
- 6 • *C.R., individually and as next of friend to minor S.G. v. Meta Platforms, Inc., et al.*, 4:23-
- 7 cv-06301 (Exhibit 4); and
- 8 • *V.K., individually and as next of friend to minor A.K. v. Meta Platforms, Inc.*, 4:23- cv-
- 9 05093 (Exhibit 5).

10 Exhibits 1-5 to the Anderson Declaration are Applications submitted to Plaintiffs' Liaison
 11 Counsel for filing since the last guardian *ad litem* submission. The Applications attached to the
 12 Anderson Declaration as Exhibits 1-5 are consistent with Attachment A to this Court's Guardian
 13 *Ad Litem* Order (ECF No. 122) and include (1) the applicant's name and contact information
 14 (including address, email, and telephone number); (2) the name, case number, state of domicile
 15 (and its minimum age of capacity); (3) a sworn statement that the applicant is the parent and/or
 16 legal guardian of the minor plaintiff; and (4) a sworn statement affirming that the applicant is
 17 fully competent and qualified to understand and protect the rights of the minor plaintiff and has
 18 no interests adverse to the interests of that person. Anderson Decl. ¶ 8.

19 Pursuant to this Court's Guardians *Ad Litem* Order, the Applications by parents and/or
 20 legal guardians in the cases listed above are deemed presumptively approved upon filing, as there
 21 is no apparent conflict between the applicants' parental responsibility and their obligation to assist
 22 the Court in "achieving a just and speedy determination of the action." ECF No. 122 ¶ 4 (citing
 23 *J.M.*, 2016 WL 494299, at *1). This Court also ordered that, absent the filing of an objection, the
 24 presumptive approval shall become final fifteen days after the date this *Ex Parte* Application is
 25 filed. ECF No. 122 ¶ 5. Therefore, the objection period will close on January 19, 2024.

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Accordingly, Plaintiffs submit herewith a [Proposed] Order Granting *Ex Parte* Applications and Appointing Guardian *Ad Litem* appointing the parent and/or legal guardian named in the Applications submitted in the case listed above.

Dated: January 4, 2024

Respectfully submitted,

/s/ Jennie Lee Anderson

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